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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

EMELIA M PASTERNAK,	)	Case No. 4:07-cv-04980-CW (BZ)
	)	
Plaintiff,	)	
	)	JOINT REQUEST AND
v.	)	PROPOSED ORDER EXTENDING
	)	DATES FOR COMPLETING
TRANS UNION, LLC, et al,	)	DISCOVERY AND FILING CASE
	)	DISPOSITIVE MOTIONS
Defendants.	)	
	)	

The parties through their respective counsel have had extensive discussions concerning the completion of the depositions of the parties. Currently the date set for completion of fact discovery is September 5, 2008. Case Management Order, Dkt. #62. The Court has scheduled October 9, 2008 as the last day for hearing case dispositive motions and for the next case management conference. Id.

*Pasternak v. Trans Union, LLC*, ND Cal., case no. 4:07-cv-04980 CW (BZ)  
Joint Request and Proposed Order

1 Due to the unavailability of witnesses and counsel at various times during the  
2 next six weeks, counsel have been unable to schedule depositions of the parties in a  
3 way that will permit the parties to complete the discovery they need within that  
4 timeframe and accommodate the legitimate needs of all parties.

5 The parties and their respective counsel agree that a two week extension of the  
6 deadlines for the completion of the depositions of all the parties and for the filing of  
7 case dispositive motions would enable them to resolve these scheduling problems  
8 without necessitating the Court's involvement. The parties jointly request that the  
9 Court enter an order extending the deadline for the completion of depositions of the  
10 parties to September 19, 2008, and that it also extend the deadline for hearing case  
11 dispositive motions and the date of the next case management conference to October  
12 23, 2008.

13 July 24, 2008.

14 KEMNITZER, ANDERSON, BARRON OGILVIE & BREWER LLP  
15 ROBERT S. SOLA, P.C.

16 By                   /s/                    
17 Andrew J. Ogilvie  
18 Attorneys for Plaintiff  
Emelia M. Pasternak

19 REED SMITH

20  
21 By                   /s/                    
22 Veronica Kuiumdjian  
23 Attorneys for Defendant  
Capital One Bank

24 JONES DAY

25 By                   /s/                    
26 Lucinda Andrew  
27 Attorneys for Defendant  
Experian Information Solutions, Inc.

1 KING & SPALDING

2 By \_\_\_\_\_/s/\_\_\_\_\_  
3 Cara Hergenroether  
4 Attorneys for Defendant  
Equifax Information Services LLC

5 MUSICK, PEELER & GARRETT LLP

6 By \_\_\_\_\_/s/\_\_\_\_\_  
7 Donald E. Bradley  
8 Attorneys for Defendant  
Trans Union LLC

9  
10 [Proposed] **ORDER**

11 Pursuant to the stipulation of the parties by their respective counsel, the Court  
12 hereby ORDERS that the discovery deadline for the completion of the depositions of the  
13 parties is extended to September 19, 2008 and the last day for hearing case dispositive  
14 motions is extended to 2 pm on October 23, 2008. The next case management conference  
15 shall be 2 pm on October 23, 2008.

16 Dated: July \_\_, 2008

17 \_\_\_\_\_  
18 Claudia Wilken  
19 United States District Judge  
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